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February 6, 2015

Hon. Richard M. Berman United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: LightSquared Inc., et al., v. Deere & Company, et al., No.13-CV-8157 (RMB);

Harbinger Capital Partners LLC, et al., v. Deere & Company, et al.,

No. 13- CV-5543 (RMB)

Dear Judge Berman:

We are counsel for Deere & Company in the above-referenced actions. I am writing to request that the date for the Settlement Conference, set by the Court yesterday for March 2, 2015, be changed in light of certain scheduling conflicts. On March 2, I am scheduled to appear for a status conference in a large multi-district litigation in the United States District Court for the District of Massachusetts. In addition, on March 2, Eugene Assaf of Kirkland & Ellis, lead counsel for LightSquared, has an oral argument before the United States Court of Appeals for the Third Circuit.

The parties have conferred about alternative dates for the Settlement Conference. Counsel for the parties and client representatives who wish to attend are available on March 12, 2015. Accordingly, subject to the Court's availability on that day, the parties respectfully request that the Settlement Conference be rescheduled for March 12, 2015.

Thank you for your attention to this matter.

Respectfully,

Kenneth I. Schacter

cc: Counsel of Record (via ECF)